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June 13, 2011

VIA ECF

The Honorable Michael A. Shipp
United States Magistrate Judge
United States District Court
District of New Jersey
Martin Luther King, Jr. Federal Building & U.S. Courthouse
50 Walnut Street
Newark, NJ 07101

Re:

United Food Imports, Inc. v. Paradise Halal Meat, LLC, et. al. 2:09-cv-02835 (DRD)

Honorable Sir,

This firm represents the defendants Paradise Halal Meat LLC and Abdelgawad Elsayed ("Defendants") in the above-referenced matter. Pursuant to this Court's directive, we write this letter jointly with counsel for Plaintiff to provide the Court with a status update due to the upcoming Telephone Status Conference scheduled for June 16,

2011 at 3:00 pm.

On June 8, 2011, Judge Debevoise issued an order granting Plaintiff's motion for summary judgment on the issue of liability against Defendants and enjoining Defendants from selling any products using the "Basma" trademark or associated packaging and graphics. Because the decision was only recently decided, Defendants are still analyzing the Opinion to determine whether, among other things, filing a notice of appeal is appropriate or whether it is possible to resolve the matter with Plaintiff.

Plaintiff's position is that the next step is for the parties to complete the pre-trial order, which is now limited to subjects of willfulness and damages. Plaintiff is still open to discussing settlement, provided that the Defendants are more realistic. Plaintiff

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believes that another settlement conference will only be productive if the defendants are willing to substantially move off their last offer.

Respectfully submitted,

BALLON STOLL BADER & NADLER, P.C.

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